

1 produce all responsive, relevant, non-privileged documents at a mutually-agreeable time and
2 location.

3 **INTERROGATORY NO. 2:** Identify all persons with knowledge or whom you
4 believe may have knowledge relevant to the claims or defenses in this case, including a
5 summary of the information or knowledge they have.

6 **ANSWER:** United states that this information has been previously provided
7 to Plaintiff in United's Rule 26(a)(1)(A) Initial Disclosures. United hereby supplements those
8 initial disclosures as follows:

9 **15. Chloe Bickle-Eldridge**

10 Current contact information unknown

11 Last known address:

12 1311 NE Highland

13 Portland, OR 97211

14 Ms. Bickle-Eldridge was a United flight attendant who resigned in September 2005.
15 She may have information and knowledge about Lisa Stout's conduct as a United pilot and
16 about the matters discussed in United's Response to Request for Production No. 14 and
17 United's Answer to Interrogatory No. 1.

18 **REQUEST FOR PRODUCTION NO. 16:** Produce all formal or informal demands,
19 complaints, claims, charges, or correspondence which assert or allege a condition or claim of
20 sexual harassment or hostile work environment based on gender against United Air Lines, for
21 the time period of October 1990 to the present, including but not limited to complaints or
22 charges to any governmental agency, union grievances, served or filed lawsuits, and
23 correspondence or other writings setting forth such allegations or claims.

24 **RESPONSE:** Object as irrelevant, overbroad, and unduly burdensome in large
25 part. This request purportedly seeks documents concerning sexual harassment complaints that
26 were not made by Lisa Stout, that do not involve allegations that are in any way similar to Lisa
Stout's allegations, that did not occur in Lisa Stout's work environment, that are not known to
involve the same alleged perpetrators, and which have no temporal relation to the complaints